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6 IN THE UNITED STATES DISTRICT COURT  
7 FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

8 TONY ROQUE, a Washington resident

9 Plaintiff,

10 vs.

11 SEATTLE HOUSING AUTHORITY, a public  
entity,

12 Defendant.  
13  
14

**NO. 2:20-cv-658**

**DECLARATION OF BONNIE  
FONG IN SUPPORT OF  
PLAINTIFF'S REPLY TO  
DEFENDANT'S RESPONSE TO  
COURT'S ORDER TO SHOW  
CAUSE**

15 I, Bonnie Fong, am over the age of 18 and competent to testify on the matters stated herein. I  
16 declare that the following information is true under penalty of perjury:

17 I, BONNIE FONG, hereby declare as follows,

- 18 1. I am over the age of 18 and competent to testify on the matters stated herein.  
19 2. I declare the following information:  
20 3. I am one of the attorneys representing Plaintiff Mr. Tony Roque.  
21 4. On March 2, 2020, I went on the Secretary of State website to search for the Seattle  
22 Housing Authority (SHA) in order to obtain SHA's registered agent information.  
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- 1 5. On May 8, 2020, I requested a reserved spot in the parking garage from Davina  
2 O'Connor, the Raven Terrace property manager. This request was denied on May 12,  
3 2020. The following day, I told SHA's counsel that Mr. Roque would be asking for a  
4 reserved spot in this Reply and even offered to stipulate to a surreply on that narrow  
5 issue. SHA's counsel did not respond.
- 6 6. SHA does not provide a tort claim form or contact information of its specified agent  
7 through its website. The King County Auditor's Office had no information about SHA's  
8 specified agent. As a result, Mr. Roque resorted to using the "Washington State Tort  
9 Claim" form and emailed it to SHA's counsel, in anticipation for a later claim of  
10 damages, because SHA provided no other option to submit claims.

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12 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
13 knowledge, information, and belief.

14 DATED May 22, 2020.

15  
16 /s/ Bonnie Fong

Bonnie Fong  
Attorney for Plaintiff